

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

-----X  
CITLAND LIMITED,

Plaintiff,

-against-

INTERNATIONAL TOBACCO PARTNERS,  
LTD,

Defendant.  
-----X

Civil Action No.: 09-CV-3797 (ADS)(ARL)

**AFFIDAVIT IN SUPPORT OF**  
**ATTORNEYS' FEES**

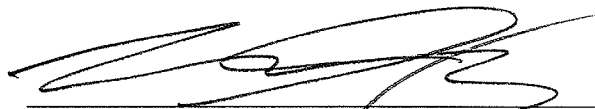
MARK GINSBERG, hereby avers under penalty of perjury as follows:

1. I am an associate attorney of Seyfarth Shaw LLP, counsel to plaintiff Citland Limited ("Citland"). I submit this Affidavit pursuant to the Decision and Order of this Court dated March 27, 2010, granting Citland's motion to recover its attorneys' fees and disbursements incurred in connection with (i) pursuing a default judgment against defendant International Tobacco Partners, Ltd. ("ITP") and (ii) opposing ITP's motion to vacate that default. I have personal knowledge of the facts set forth herein unless otherwise specified.

2. Annexed herewith are true and correct copies of invoices for \$22,597.50 (Twenty Two Thousand Five Hundred Ninety Seven Dollars and Fifty Cents) reflecting the legal fees and disbursements incurred by Citland in this matter.

3. We respectfully request that the invoiced sum be paid.

Dated: New York, New York  
April 15, 2010

  
Mark Ginsberg

Sworn to before me this  
15th day of April 2010

  
NOTARY PUBLIC

GLEND A. S. WACHTEL  
Notary Public, State of New York  
No. 60-4922575  
Qualified in Westchester County  
Commission Expires April 4, 2014

Open Invoices - [67291-000002 - Collection Litigation]  
 Client:67291 - Citland Litigation 4/15/2010 9:10:27 AM

Page 1

Type	Invoice	Date	Fees	Cost	Other	Total
BILL	1627984	11/30/2009	2,502.00	0.00	0.00	2,502.00
PAYTRST	1627984	11/30/2009	-2,502.00	0.00	0.00	-2,502.00
Total	1627984	11/30/2009	0.00	0.00	0.00	0.00
BILL	1637770	11/30/2009	2,258.50	0.00	0.00	2,258.50
PAYTRST	1637770	11/30/2009	-2,258.50	0.00	0.00	-2,258.50
Total	1637770	11/30/2009	0.00	0.00	0.00	0.00
BILL	1655984	11/30/2009	1,106.00	0.00	0.00	1,106.00
PAYTRST	1655984	11/30/2009	-1,106.00	0.00	0.00	-1,106.00
Total	1655984	11/30/2009	0.00	0.00	0.00	0.00
BILL	1680304	01/19/2010	4,016.50	12.09	0.00	4,028.59
PAYTRST	1680304	01/19/2010	-4,016.50	-12.09	0.00	-4,028.59
Total	1680304	01/19/2010	0.00	0.00	0.00	0.00
BILL	1689971	02/16/2010	4,504.00	302.00	0.00	4,806.00
PAYTRST	1689971	02/16/2010	-4,504.00	-302.00	0.00	-4,806.00
Total	1689971	02/16/2010	0.00	0.00	0.00	0.00
BILL	1699303	03/08/2010	7,565.00	39.74	0.00	7,604.74
PAYTRST	1699303	03/08/2010	-5,259.17	-39.74	0.00	-5,298.91
1PAY	wire14x	04/14/2010	-2,305.83	0.00	0.00	-2,305.83
Total	1699303	03/08/2010	0.00	0.00	0.00	0.00
BILL	1709787	04/08/2010	645.50	302.33	0.00	947.83
1PAY	wire14x	04/14/2010	-645.50	-302.33	0.00	-947.83
Total	1709787	04/08/2010	0.00	0.00	0.00	0.00
GRAND TOTAL			0.00	0.00	0.00	0.00

Billed and Unbilled Time & Fee Summary - [67291-000002 - Collection Litigation]  
 Client:67291 - Citland Litigation 4/15/2010 9:15:46 AM

Page 1

Initials	Timekeeper	Rate	Hours	Percent	Fees	Percent	Cost
1440	Paul Baisier	600.00	0.60	1.19	360.00	1.59	442.76
1821	Lydia E. Ravnkar	270.00	0.70	1.39	189.00	0.84	0.00
2118	Mark Ginsberg	347.00	9.00	17.86	3,123.00	13.82	0.00
2182	Donald Dunn	408.47	28.50	56.55	11,641.50	51.52	0.00
3346	David M. Monachino	652.84	10.90	21.63	7,116.00	31.49	0.00
3371	Carolyn Ylagan	240.00	0.70	1.39	168.00	0.74	0.00
3736	Joseph Pellis	0.00	0.00	0.00	0.00	0.00	225.00
	GRAND TOTAL WORK:		50.40		22,597.50		667.76
	GRAND TOTAL BILL:	448.36	50.40	100.00	22,597.50	100.00	667.76

**SEYFARTH**  
ATTORNEYS **SHAW** LLP

131 SOUTH DEARBORN  
SUITE 2400  
CHICAGO, ILLINOIS 60603-5577  
(312) 460-5000  
FEDERAL ID 36-2152202

ATLANTA  
BOSTON  
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NEW YORK  
SACRAMENTO  
SAN FRANCISCO  
WASHINGTON, D.C.  
BRUSSELS

October 9, 2009

Citland Litigation  
Park House, 15/18 Greenhill Crescent  
Watford  
Herts WD18 8PH  
United Kingdom  
Attention: Derek Banks, Managing Director

Invoice No. 1627984  
1440 67291 / 67291-000002  
Collection Litigation

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**INVOICE SUMMARY**

Total Fees	\$2,502.00
Total Disbursements	<u>0.00</u>
Total Fees and Disbursements This Statement	\$2,502.00
Less Retainer	<u>(2,502.00)</u>
Total Due	<u>\$0.00</u>
Retainer Balance	(\$2,498.00)

**PLEASE RETURN THIS COPY WITH YOUR PAYMENT**

PAYMENT MAY BE SENT BY CHECK TO:  
SEYFARTH SHAW LLP  
131 S. DEARBORN STREET, SUITE 2400  
CHICAGO, IL 60603-5577

PAYMENT MAY BE MADE BY WIRE TO:  
Bank of America  
ACCOUNT NAME: Seyfarth Shaw LLP Operating Account  
ACCOUNT NUMBER: 5201743357  
ABA - WIRE PAYMENT NUMBER: 026-009-593  
ABA - ACH PAYMENT NUMBER: 081-904-808  
SWIFT CODE: BOFAUS3N



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BRUSSELS

November 30, 2009

Citland Litigation  
Park House, 15/18 Greenhill Crescent  
Watford  
Herts WD18 8PH  
United Kingdom  
Attention: Derek Banks, Managing Director

Invoice No. 1637770  
1440 67291 / 67291-000002  
Collection Litigation

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### INVOICE SUMMARY

Total Fees	\$2,258.50
Total Disbursements	<u>0.00</u>
Total Fees and Disbursements This Statement	\$2,258.50
Less Retainer	<u>(2,258.50)</u>
Total Due	<u>\$0.00</u>
Retainer Balance	(\$239.50)

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ABA - ACH PAYMENT NUMBER: 081-904-808  
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November 30, 2009

Citland Litigation  
Park House, 15/18 Greenhill Crescent  
Watford  
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United Kingdom  
Attention: Derek Banks, Managing Director

Invoice No. 1655984  
1440 67291 / 67291-000002  
Collection Litigation

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### INVOICE SUMMARY

Total Fees	\$1,106.00
Total Disbursements	<u>0.00</u>
Total Fees and Disbursements This Statement	\$1,106.00
Less Retainer	<u>(1,106.00)</u>
Total Due	<u>\$0.00</u>
Retainer Balance	(\$4,133.50)

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NEW YORK  
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WASHINGTON, D.C.  
BRUSSELS

January 19, 2010

Citland Litigation  
Park House, 15/18 Greenhill Crescent  
Watford  
Herts WD18 8PH  
United Kingdom  
Attention: Derek Banks, Managing Director

Invoice No. 1680304  
1440 67291 / 67291-000002  
Collection Litigation

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#### INVOICE SUMMARY

Total Fees	\$4,016.50
Total Disbursements	<u>12.09</u>
Total Fees and Disbursements This Statement	\$4,028.59
Less Retainer	<u>(4,028.59)</u>
Total Due	<u>\$0.00</u>
Retainer Balance	(\$104.91)

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131 S. DEARBORN STREET, SUITE 2400  
CHICAGO, IL 60603-5577

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ACCOUNT NAME: Seyfarth Shaw LLP Operating Account  
ACCOUNT NUMBER: 5201743357  
ABA - WIRE PAYMENT NUMBER: 026-009-593  
ABA - ACH PAYMENT NUMBER: 081-904-808  
SWIFT CODE: BOFAUS3N



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NEW YORK  
SACRAMENTO  
SAN FRANCISCO  
WASHINGTON, D.C.  
BRUSSELS

March 8, 2010

Citland Litigation  
Park House, 15/18 Greenhill Crescent  
Watford  
Herts WD18 8PH  
United Kingdom  
Attention: Derek Banks, Managing Director

Invoice No. 1699303  
1440 67291 / 67291-000002  
Collection Litigation

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#### INVOICE SUMMARY

Total Fees	\$7,565.00
Total Disbursements	<u>39.74</u>
Total Fees and Disbursements This Statement	\$7,604.74
Less Retainer	<u>(5,298.91)</u>
Total Due	<u>\$2,305.83</u>
Retainer Balance	\$0.00

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**SEYFARTH**  
ATTORNEYS **SHAW** LLP

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BRUSSELS

April 8, 2010

Citland Litigation  
Park House, 15/18 Greenhill Crescent  
Watford  
Herts WD18 8PH  
United Kingdom  
Attention: Derek Banks, Managing Director

Invoice No. 1709787  
1440 67291 / 67291-000002  
Collection Litigation

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**INVOICE SUMMARY**

Total Fees	\$645.50
Total Disbursements	<u>302.33</u>
Total Fees and Disbursements This Statement	<u>\$947.83</u>

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